

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

|                           |   |  |
|---------------------------|---|--|
| <b>IN RE:</b>             | ) | <b>CASE NO: 22-42159-659</b>                   |
| <b>MICHELE RENEE DION</b> | ) | <b>Chapter 13</b>                              |
|                           | ) |  |
|                           | ) | <b>Trustee's Objection to Confirmation</b>     |
|                           | ) | <b>Original Confirmation Hearing set for :</b> |
| <b>Debtor</b>             | ) | <b>September 8, 2022 11:00 am</b>              |

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The plan provides for interest to secured creditors at a rate other than that determined by the Clerk under Local Rule 3015-2(E).
2. The plan does not contain enough funds to pay secured and priority creditors in full and pay the amount guaranteed to general unsecured creditors (if any). 11 U.S.C. §§ 1322(a)(2) and 1325(a)(5)(B)(ii). The approximate amount of the shortfall is \$5,200.
3. HUD has filed a proof of claim secured by Debtor's real estate, but Debtor does not schedule and the plan does not address the debt to HUD.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: September 07, 2022

OBJCONFAP--DSD

/s/ Diana S. Daugherty

Diana S. Daugherty  
Standing Chapter 13 Trustee  
P.O. Box 430908  
St. Louis, MO 63143  
(314) 781-8100 Fax: (314) 781-8881  
trust33@ch13stl.com

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on September 07, 2022, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on September 07, 2022.

MICHELE RENEE DION  
41 KINGSTON DR  
MOSCOW MILLS, MO 63362

/s/ Diana S. Daugherty  
Diana S. Daugherty